

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS)	No. 2:15-md-02641-DGC
PRODUCTS LIABILITY LITIGATION)	
)	MASTER SHORT FORM COMPLAINT
)	FOR DAMAGES FOR INDIVIDUAL
)	CLAIMS

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

COMES NOW, undersigned counsel in the above referenced civil action, and moves the Court for leave to withdraw as counsel for Plaintiff Deborah Lee Jarem. In support of this Motion, Counsel states as follows:

The above-styled matter was filed against the defendants directly in the above styled MDL.

District of Arizona Local Rule of Civil Procedure 83.3(b)(2) allows an attorney who has entered an appearance in a civil action to withdraw the appearance upon order of the Court.

The declaration of undersigned counsel is attached as Exhibit 1, explaining that undersigned counsel is not able to make contact with the plaintiff, undersigned counsel therefore files this motion for leave to withdraw from plaintiff's case. Undersigned counsel is US Mailing a copy of this motion, as indicated on the below certificate of service, to the last address of the plaintiff made known to undersigned counsel by the plaintiff. Undersigned counsel moves this Court to provide plaintiff with a period of at least 45 days from the date of the order allowing her former counsel to withdraw within which to select and have new counsel enter an appearance on her behalf. Finally, undersigned counsel has been served with a deficiency letter pursuant to Case

Management Order, No. 5 [Doc. 365], P. 2. Undersigned counsel requests this Court stay the 20 day deadline created by the deficiency letter, during the time period ordered by the Court for plaintiff to obtain new counsel.

Respectfully submitted,
LAW OFFICES OF HENRY S. QUEENER, III

/s/ Henry S. Queener
HENRY S. QUEENER
TN BPR #:021249
KY BAR #: 97840
213 5TH AVENUE NORTH
SUITE 200
NASHVILLE, TN 37219
PHONE (615) 933-9000
FAX (615) 732-1531
HQUEENER@QUEENERLAW.COM
ATTORNEY FOR THE PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL. Further, I certify a true and exact copy of the foregoing was forwarded to the following:

Deborah Lee Jarem
205 Capri Cove Place
Sanford, FL 32771

/s/ Henry S. Queener
Henry S. Queener